

Country of Origin Labeling Program  
Agricultural Marketing Service  
USDA Stop 0249, Room 2092-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0249

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

This letter is in response to your request for comments on the USDA's Country of Origin Labeling (COL) Voluntary Guidelines.

I am the owner of a family owned supermarket business being charged with the unprecedented responsibility to inform customers of the country of origin for all non-processed beef, pork, lamb, fresh/frozen fruits and vegetables, fresh/frozen seafood (for which we must also identify the method of production) and peanuts sold in our store(s).

Our associates cannot look at a package of meat to determine where an animal was born, raised or slaughtered, neither can they determine where an apple is grown nor where a fish was caught or raised; yet under the guidelines we are responsible for providing that information to our customers. As you develop regulations, we encourage you to be flexible in labeling or signage requirements. Non-compliance for something we have little control over could ultimately result in a \$10,000 fine for incorrectly or non-labeled products. That is blatantly unfair.

Under the voluntary guidelines, records must be maintained for 2 years. Most of the products covered in the COL law will be sold and consumed prior to the 2 year period. It serves no useful purpose to keep records of an apple consumed 2 years ago. I urge you to implement reasonable record keeping requirements that include hard or electronic versions, and most importantly that the record keeping ultimately the responsibility of the supplier.

SCOTT CAPANO